

**ONTARIO
SUPERIOR COURT OF JUSTICE
(East Region)**

IN THE MATTER OF an Application by the Attorney General for Ontario for an order restraining monetary donations made through the Freedom Convoy 2022 and Adopt-a-Trucker fundraising campaign pages hosted by GiveSendGo pursuant to section 490.8 of the *Criminal Code*.

RESTRAINT ORDER

UPON THE *EX PARTE* APPLICATION in writing made this day by the Attorney General for Ontario for an order pursuant to section 490.8 of the *Criminal Code*.

AND UPON READING the Notice of Application and the Affidavit of Christopher Rhone, peace officer and member of the Ottawa Police Service, accompanying the Application.

AND UPON BEING SATISFIED that there is no requirement of notice of this application as giving notice would result in the disappearance, dissipation, or reduction of value of the property sought to be restrained.

AND UPON BEING SATISFIED that pursuant to section 490.8(3.1) of the *Criminal Code*, this order may be issued in respect of property situated outside Canada.

AND UPON BEING SATISFIED that there are reasonable grounds to believe the property described below is offence-related property:

Any and all monetary donations made through the Freedom Convoy 2022 and Adopt-a-Trucker fundraising campaign pages hosted by GiveSendGo (www.givesendgo.freedomconvoy2022, www.givesendgo.com/Warroomcanadanet, respectively), including monetary donations which have been transferred by GiveSendGo or its third-party payment processors to the benefit of the campaign recipients as named on the said campaign pages, being “Chris Garrah” and “Incorporated Freedom 2022 Human Rights and Freedom Association”, or to the company “Freedom 2022 Human Rights and Freedoms” (Canadian corporation number 1372685-1).

[the property]

1. **THIS COURT ORDERS** that all persons, including but not limited to GiveSendGo and its third party payment processors, designates and agents, Chris Garrah or designate, Freedom 2022 Human Rights and Freedoms and its directors, officers, employees or designates, and financial institutions, are prohibited from disposing of, or otherwise dealing with, in any manner whatsoever, any interest in the property, except as hereinafter provided.
2. **THIS COURT FURTHER ORDERS** that the respondents shall, upon written request of the Director of Asset Management – Criminal or his representative, provide said person with reasonable information regarding the status of the property, including but not limited to, the balance of all donations held in relation to the Freedom Convoy 2022 and Adopt-a-Truck fundraising campaigns, as described above.
3. **THIS COURT FURTHER ORDERS** that a copy of this order be served in accordance with the *Criminal Proceedings Rules* upon the following persons:
 - a. GiveSendGo LLC
 - b. Freedom 2022 Human Rights and Freedoms (Corporation Number 1372685-1)
 - c. Chris Garrah
4. **THIS COURT FURTHER ORDERS** that no variation shall be made to this order other than by order of this Court on application in accordance with the *Criminal Proceedings Rules* served on all affected parties, however, provided that counsel for the Attorney General for Ontario may, on three clear days' notice to any affected parties, apply to a Judge of this Court to vary, amend, add, or delete terms in relation to this order, or to terminate this order.
5. **THIS COURT FURTHER ORDERS** that service of any documents or notices of any application on the Attorney General for Ontario or the Director of Asset Management - Criminal shall be served at the Crown Law Office – Criminal, 720 Bay Street, 10th Floor, Toronto, Ontario, M7A 2S9.

6. **THIS COURT FURTHER ORDERS** that, as provided by subsection 490.8(8) of the *Criminal Code*, this order as it relates to the restraint of offence-related property remains in effect until:

- a) An order is made under subsection 490(9) or (11), 490.4(3) or 490.41(3) in relation to the property; or
- b) An order of forfeiture of the property is made under section 490 or subsection 490.1(1) or 490.2(2).

Dated at Ottawa, Ontario, this ____ 10 ____ day of February, 2022.



A.C.J.S.C.J.

Judge, Ontario Superior Court of Justice

TAKE NOTICE:

Section 490.8(9) of the Criminal Code provides as follows: Any person on whom a restraint made under this section is served in accordance with this section and who, while the order is in force, acts in contravention of or fails to comply with the order is guilty of an indictable offence or an offence punishable on summary conviction.

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MINISTRY OF THE ATTORNEY GENERAL

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